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Attorney for Defendant
JESUS VASQUEZ

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA.

Plaintiff,

VS.

JESUS LOUIS VASQUEZ,

Defendant

STIPULATION

Plaintiff United States of America, by and through its counsel of record, Special Assistant United States Attorney Caily Nelson, and defendant, by and through its counsel of record, Mark J. Reichel, hereby stipulate as follows:

1. By stipulation, the defendant moves to continue the status conference to February 10, 2026, at 9:00 a.m., and to exclude time between December 9, 2025, and February 10, 2026, with an exclusion of time, under Local Code T4.
 2. Defendant is housed at Nevada City Jail and requires the services of an interpreter. Defense counsel has been in lengthy state court hearings out of county and needs the additional time

1 to make arrangements with court appointed interpreters, after a pause of that work had
2 occurred, to finalize the matter for a change of plea.

- 3 3. The parties agree and stipulate, and request that the Court find the following:
- 4 a. The discovery associated with this case includes over one hundred pages of reports,
5 photos, and search warrant documents, as well as cellular phone downloads. This
6 discovery has been entirely produced directly to counsel and/or made available for
7 inspection and copying.
- 8 b. Counsel for the defendant desires additional time to review the discovery with his client,
9 research and investigate possible defenses, discuss any potential resolution with his
10 client, research mitigating evidence, and present it to the prosecution. Defendant is
11 housed at the Nevada County jail and speaks Spanish, making efficient communication
12 challenging.
- 13 c. Counsel for defendant believes that failure to grant the above requested continuance
14 would deny him/her the reasonable time necessary for effective preparation, considering
15 the exercise of due diligence.
- 16 d. The government does not object to the continuance.
- 17 e. Based on the above findings, the ends of justice served by continuing the case as
18 requested outweigh the interest of the public and the defendant in a trial within the
19 original date prescribed by the Speedy Trial Act.
- 20 f. For the purposes of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq.
21 within which trial must commence, the time period of December 9, 2025, to February 10,
22 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv)
23 [Local Code T4] because it results from a continuance granted by the Court at defendant's
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1 request on the basis of the Court's finding that the ends of justice served by taking such
2 action outweigh the best interests of the public and the defendant in a speedy trial.

3 4. Nothing in the stipulation and order shall preclude a finding that the other provisions of the
4 Speedy Trial Act dictate the additional time periods are excludable from the period within
5 which a trial must commence.
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8 ERIC GRANT
9 United States Attorney
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11 Dated: December 3, 2025

/s/ Caily Nelson
CAILY NELSON
Special Assistant U.S. Attorney

13 Dated: December 3, 2025

/s/ Mark J. Reichel
MARK J. REICHEL
Attorney for Jesus Vasquez

ORDER

The December 09, 2025 Further Status Conference/Possible Change of Plea Hearing is VACATED and RESET for February 10, 2026, at 09:00 a.m., in Courtroom 6, before Senior District Judge John A. Mendez.

The Court specifically finds that based on the facts set forth in the parties' stipulation, the failure to exclude the time would deny counsel reasonable time necessary for effective preparation, considering the exercise of due diligence. The Court further finds that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. Time from December 9, 2025, to and including February 10, 2026, is excluded from the computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), and Local Code T-4. With this stipulation, 0 of 63 days have been used against the computation of time within which a trial must commence.

IT IS SO ORDERED.

Dated: December 03, 2025


JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE